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Paul Hastings

Paul, Hastings, Janofsky & Walker LLP
75 East 55th Street • New York, NY 10022
telephone 212 318 6000 • tacsimile 212 319 4090 • www.paulhastings.com

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Jerjing
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Jow York
Drange County
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Paris
Jero Diego
Jero Trancisco
Jero Jero
Jero

Vashington, DC

(212) 318-6022 cherylsaban@paulhastings.com

January 4, 2006

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VIA FACSIMILE 212 805 6382

The Honorable Victor Marrero United States District Judge United States District Court Southern District of New York 40 Centre Street, Suite 414 New York, New York 10007 USDC SDNY
DOCUMENT
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Re: Klein v. Fidelity National Financial, Inc. et al.

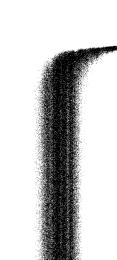
Docket No. 06-27

Your Honor:

We represent the Defendants Fidelity National Title Insurance Company, Fidelity National Financial, Inc., Jason Gordon, Mark Schiffman, Cheryl R. Saban, and William P. Foley, II in the above-referenced matter. We write to request an exception to the page limitation rule for memoranda of law, as outlined in your individual rules § II(B). We ask Your Honor to extend the page limit from twenty-five (25) to forty (40) pages for Defendants' Memorandum in Support of their Motion to Dismiss, to be filed on January 9th.

Plaintiff's complaint contains two hundred and thirty-six (236) paragraphs, thirteen (13) counts, and names nine (9) individual defendants. The claims are diverse, including but not limited to claims for defamation, employment discrimination, breach of contract, Section 349 of the New York State General Business Law, intentional infliction of emotional distress and a shareholder derivative action. Many of the counts in the complaint name multiple defendants and contain individual defendant-specific factual allegations. Therefore, Defendants' Motion to Dismiss will require a more extensive and complex level of briefing. We therefore request an exception to your rule to allow for Defendants to submit a Memorandum In Support of their Motion to Dismiss that will not exceed forty (40) pages.

We look forward to your response and thank you for your consideration.



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Hon. Victor Marrero January 4, 2006 Page 2

Respectfully submitted,

Cheryl R. Saban

of PAUL, HASTINGS, JANOFSKY & WALKER LLP

CRS:jjl

cc: Saul J. Klein, via Facsimile (253) 660-5052

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SO ORDERED:	1/1/1/2-
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DATE	VICTOR MARRERO, U.S.D.J.